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Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company,

Plaintiff,

vs.

TENZA TRADING LTD., a Cyprus
Company,

Defendant.

No. 3:13-cv-01045-SI

**JOINT REQUEST FOR RULE 16
CONFERENCE**

Pursuant to Local Rule 16-2, Plaintiff Calista Enterprises, Ltd. (“Calista”) and Defendant Tenza Trading Ltd. (“Tenza”) jointly request a Rule 16 conference with the Court.

Counsel for the parties first conferred pursuant to FRCP 26(f) on September 12, 2013. During this conference, counsel discussed (among other issues) a proposed case management schedule for the initial deadlines in the case. Counsels’ proposals did not match; briefly, Tenza desires to pursue a faster case schedule than Calista and proposed a schedule with shorter deadlines. At the conclusion of the call, counsel agreed to discuss the dates proposed by each side with their respective clients and reconvene for further discussions. At the subsequent conference on September 18th, counsel could not agree to the case management schedule.

Tenza has served discovery and has requested the deposition of Plaintiff’s principal member in November. Calista has filed a motion to stay this case pending resolution of an invalidity challenge pending before the Trademark Trial and Appeal Board. The parties have an issue concerning Tenza’s request to schedule an international deposition in November. The

parties respectfully request the assistance of the Court in resolving scheduling matters.

Dated this 21st day of October, 2013.

Respectfully submitted,

s/ Devon Zastrow Newman

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